

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

MOTORS LIQUIDATION COMPANY, et al.,
F/k/a General Motors Corp., et a.

Chapter 11 Case. No.
09-50026 (REG)

Debtors

**OPPOSITION TO 220TH OMNIBUS
OBJECTION TO CLAIMS**

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TO THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE:

1. I am a member of the firm of Altschul Goldstein & Geller LLP attorneys for AIG and its subsidiary and sister companies with respect to Claim Nos. 67483, 67482, 67485, 67484, 67425, 67423, 67424, 67427, 67426 which are among the claims listed on the 220th Omnibus Objection to Claims.

2. I am hereby submitting my opposition to the Omnibus Objections which cover the claims noted above.

3. Contrary to the assertions made in Counsel's moving papers, the nine claims listed do not satisfy the requirement that the hold is co-liable with the Debtors in the underlying claim of a third party.

4. While all of the claims stated are in fact property damage claims brought forth on the basis of the subrogation rights and obligations set out in the insurance contract between the subrogor and the insurance company bringing the claim, none of the property damage claims arise out of any action which involves another party.

5. Each of these claims are claims for property damage which came about as a result of

fires affecting a single automobile belonging to the subrogor.

6. None of these claims are claims for property damage caused to another which my client now claims is caused by the Debtor.

7. All of these claims arise by virtue of the fact of the Debtor's direct negligence and product liability and their responsibility therefor.

8. In light of the foregoing it is respectfully requested that the 220t Omnibus Objection to Claims be dismissed insofar as Claim Nos. 67483, 67482, 67485, 67484, 67425, 67423, 67424, 67427, 67426 are concerned.

Dated: New York, New York
May 10, 2011

/s/ Joyce M. Goldstein

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